

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

John Hawkins and HawkLaw, PA,)	C/A No.:
)	
Plaintiffs,)	<u>PLAINTIFFS' RESPONSES TO LOCAL</u>
)	<u>RULE 26.01 INTERROGATORIES</u>
versus)	
)	
The South Carolina Commission on)	
Lawyer Conduct, Christopher G. Isgett,)	
The South Carolina Office of Disciplinary)	
Counsel, John S. Nichols and Alan Wilson,)	
South Carolina Attorney General,)	
)	
Defendants.)	
)	

Plaintiffs, John Hawkins and Hawk Law, PA, respond Local Civil Rule 26.01 Interrogatories as follows:

A. State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None.

B. As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: Plaintiffs claims challenge the constitutionality of various rules and should be tried non-jury.

C. State whether the party submitting these responses is a publicly owned company and separately identify (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

RESPONSE: Hawk Law, PA is a privately owned company. John Hawkins owns 100% of Hawk Law, PA.

D. State the basis for asserting your claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: Plaintiffs and their attorneys believe Defendants reside in this judicial district and believe Defendants' actions giving rise to case happened primarily in this judicial district.

E. Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

RESPONSE: Plaintiffs and their attorneys believe this action is related to another action, Kirkendall Dwyer, LLP and John Doe, Plaintiffs vs. The South Carolina Commission on Lawyer Conduct, Christopher G. Isgett, The South Carolina Office of Disciplinary Counsel, John S. Nichols and Alan Wilson, South Carolina Attorney General, Defendants. Docket No.: 3:20-2192-JMC. The Defendants in this action are the same as those in the Kirkendall Dwyer case and Plaintiffs in this action are challenging the constitutionality of various Rules of Professional Conduct similar to what Plaintiffs in the Kirkendall Dwyer matter pursued. On information and belief, Plaintiffs in the Kirkendall Dwyer matter dismissed their action without prejudice.

Respectfully submitted,

/s/ Robert D. Dodson
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